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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LORI BELL, an individual,

Plaintiff,

v.

CLACKAMAS COUNTY, a local government,
and **GREG GEIST**, an individual,

Defendants.

CASE NO. 3:22-cv-01885-AN

JOINT STATUS REPORT

1. Pursuant to FRCP 26(f) , and the Court's June 6, 2023 Order to prepare this report, the parties conferred on the contents of this proposed discovery plan on June 8, 2023.
2. The parties jointly propose the following discovery plan and case deadlines:
 - a. Initial Disclosures have been completed and served by both parties;
 - b. Fact discovery is ongoing. The parties are working to schedule depositions in the last two weeks of August and the first two weeks of September. It is anticipated that scheduling will be completed the week of June 12, 2023. The parties have agreed to a 60-day extension of the discovery deadline currently set for August 17, 2023 to be moved to October 17, 2023, if agreeable to the

Court.

- c. Dispositive motions, if any, to be filed by November 28, 2023;
- d. Joint ADR Report due 30 days after rulings on summary judgment or, if no dispositive motions are filed, 30 days after the dispositive motion deadline;
- e. Expert disclosures due 90 days prior to trial, with counter-designations of rebuttal experts due 60 days prior to trial.

DATED this 9th day of June, 2023.

s/Matthew C. Ellis

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